

# **EXHIBIT A**

[Proposed] Verdict Form

- (1) Was the methylprednisolone acetate (MPA) from NECC unreasonably dangerous or defective?

Yes \_\_\_\_\_

No \_\_\_\_\_

- (2) Do you find St. Thomas Neurosurgical sold methylprednisolone acetate (MPA) to Plaintiffs

Yes \_\_\_\_\_

No \_\_\_\_\_

- (3) Do you find the following entities/persons to be at fault?

St. Thomas Neurosurgical Center Yes \_\_\_\_\_ No \_\_\_\_\_

Howell Allen Clinic Yes \_\_\_\_\_ No \_\_\_\_\_

John Culclasure, MD Yes \_\_\_\_\_ No \_\_\_\_\_

Debra Schamburg Yes \_\_\_\_\_ No \_\_\_\_\_

New England Compounding Center Yes \_\_\_\_\_ No \_\_\_\_\_

- (4) Do you find that St. Thomas Neurosurgical was the agent of St. Thomas Hospital, St. Thomas Network, or St. Thomas Health Services?

Yes \_\_\_\_\_

No \_\_\_\_\_

- (5) Using 100 percent as the total combined harm, what percentage of the total fault is chargeable to each of the following defendants:

St. Thomas Neurosurgical \_\_\_\_\_%

Howell Allen Clinic \_\_\_\_\_%

New England Compounding Center \_\_\_\_\_%

(6) Decide the total amount of damages sustained by the plaintiff  
\_\_\_\_\_.

\$ \_\_\_\_\_ Pain and Suffering - past

\$ \_\_\_\_\_ Pain and Suffering - future

\$ \_\_\_\_\_ Loss of ability to enjoy life - past

\$ \_\_\_\_\_ Loss of ability to enjoy life - future

\$ \_\_\_\_\_ Medical care/Services - past

\$ \_\_\_\_\_ Medical care/Services - future

\$ \_\_\_\_\_ Loss of earning capacity - past

\$ \_\_\_\_\_ Loss of earning capacity - future

\$ \_\_\_\_\_ TOTAL